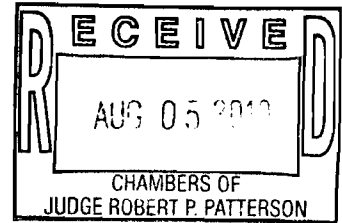


LEVI LUBARSKY & FEIGENBAUM LLP

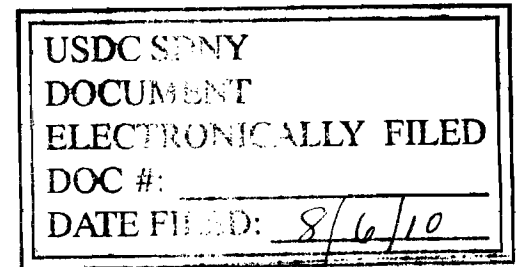
ATTORNEYS AT LAW
1185 AVENUE OF THE AMERICAS
17TH FLOOR
NEW YORK, NEW YORK 10036
TEL (212) 308-6100
FAX (212) 308-8830
WWW.LLF-LAW.COM



August 5, 2010

VIA FACSIMILE TO (212) 805-7917

Hon. Robert P. Patterson
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312



Re: Levin v. Bank of New York, Case No. 09 Civ. 5900 (RPP) (S.D.N.Y.)

Dear Judge Patterson:

We represent defendants and third-party plaintiffs JPMorgan Chase Bank, N.A. and The Bank of New York Mellon in the above-referenced proceeding.

I am enclosing a stipulation and proposed order that expands the scope of the existing confidentiality stipulation and order in this action (as modified and amended, the "Confidentiality Order") so as to make Confidential Information, including unredacted copies of plaintiffs' summary judgment motion papers, available to the third-party defendants who have obtained judgments against or brought suit against the Islamic Republic of Iran. The final draft of this proposed order was circulated last Friday, July 30, 2010. It has now been signed by Stroock & Stroock & Lavan LLP, representing the Greenbaum and Acosta third-party defendants, DLA Piper, representing the Estate of Heiser and Estate of Campbell third-party defendants, and Heideman Nudelman & Kulik, PC, representing the Silvia, Brown and Bland third-party defendants.¹

We respectfully ask the Court to so order the enclosed stipulation and proposed order.

We also hereby designate as Confidential those portions of the summary judgment motion papers that reflect the names of parties to or participants in blocked deposit accounts or blocked wire transfers, the specific dollar amounts of particular blocked accounts or transactions and the account numbers in which such funds are held. This comports with the requirements of the Court's sealing order that was so ordered on January 20, 2010.

¹ Counsel for other third-party defendants have had ample time to sign but have not done so or objected to the terms of the proposed order. They can sign the stipulation at a later time if they wish.

So
Ordered
Robert P. Patterson
USDC
8/6/10

Hon. Robert P. Patterson
August 5, 2010
Page 2

As soon as the enclosed stipulation and proposed order has been so ordered we will be in a position to produce confidential documents to those parties that have served Requests for Production of Documents pursuant to Rule 34 of the Federal Rules of Civil Procedure. Once the third-party defendants have received unredacted copies of the summary judgment motion papers, they should be able to respond to this Court's order of July 2, 2010, which directs them to confer and provide the Court with a proposal regarding the briefing of the summary judgment motion.

In light of counsel for plaintiffs' requested date of September 29, 2010 for oral argument of their summary judgment motion, we have proposed that any papers that defendants may submit with respect to the summary judgment motion must be served and filed by September 13, 2010, with any reply papers to be served and filed by September 24, 2010. Plaintiffs' counsel have agreed to this schedule except with respect to their motion to dismiss the counterclaim interposed against the plaintiffs by defendant Société Générale.

Respectfully submitted,



J. Kelley Nevling, Jr.

*The brief schedule is approved
So ordered
Robert P. Patterson
8/6/10*

cc: James L. Bernard, Esq. (by e-mail)
Suzelle M. Smith, Esq. (by e-mail)
Sharon L. Schneier, Esq. (by e-mail)
Christopher J. Robinson, Esq. (by e-mail)
Mark G. Hanchet, Esq. (by e-mail)
Christopher J. Houpt, Esq. (by e-mail)
Noel J. Nudelman, Esq. (by e-mail)
Richard M. Kremen, Esq. (by e-mail)
Dale K. Cathell, Esq. (by e-mail)
Liviu Vogel, Esq. (by e-mail)
Other Third-Party Defendants' Counsel (by e-mail)